

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Monday, February 03, 2014 5:24 PM
To: britpete@aol.com; 'Sami Malaeb'
Cc: Roe, Dilan, Env. Health; LGRIFFIN@OAKLANDNET.COM
Subject: Chevron 98861 (Independent); 2145 35th Avenue, Oakland, (RO2945)

Categories: Red Category

Mr. Robertson,

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *Soil and Groundwater Investigation Report*, dated November 12, 2013, (received November 25, 2013), and the *Semi-Annual Groundwater Monitoring Report, Fifth Sampling Event, December 2013*, dated December 23, 2013. The reports were prepared and submitted on your behalf by Eagle Environmental Construction (EEC). Thank you for submitting the reports. The investigation report documented the installation of soil bores BH-16 to BH-25 that appear to have defined the downgradient and lateral extent of the soil and groundwater plume, and evaluated the site against the Low-Threat Closure Policy (LTCP). The report found that the site does not meet the media-specific vapor intrusion to indoor air criteria, and recommended that an Feasibility Study and Corrective Action Plan (FS/CAP) be generated. The report also initially proposed the excavation of soil to a depth of 8 feet based on a foundation depth of approximately 2.5 feet in order for the site to meet the 5 foot bioattenuation zone free of Total Petroleum Hydrocarbon (TPH) concentrations for vapor intrusion.

ACEH has evaluated the data and recommendations presented in the above-mentioned reports, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we have determined that the site fails to meet the LTCP General Criteria e (Site Conceptual Model), and the Media-Specific Criteria for Vapor Intrusion to Indoor Air (see Geotracker for a copy of the updated LTCP checklist).

At this juncture ACEH requests that you address the Technical Comments provided below. Prior to submitting additional reports such as an FS / CAP, ACEH would like to invite you to a meeting to discuss the site and strategize about the most efficient path towards closure. ACEH requests notification of suitable dates and times for the meeting by the date identified below.

TECHNICAL COMMENTS

1. **Proposed Building Foundation Details** - Appendix D of the referenced report provided copies of the proposed future residential site and foundation plans. In order for ACEH to initially determine if excavation may be a viable remedial alternative, ACEH requests additional details relative to the proposed foundation, as follows.
 - a. **Presence of an Elevator** - The residential buildings proposed for the site are five three-story residential units. ACEH seeks to determine if one or more elevators be installed at the site. If in the affirmative, ACEH seeks to determine where the elevator shaft(s) will be located.
 - b. **Additional Site Figures** – Prior to the requested meeting, ACEH requests the submittal of a figure that depicts the location of the future residential building features on to a figure that also depicts former site use areas, and site soil bores, wells, and etc. in order to help facilitate an understanding of the juxtapositioning of past and future uses of the site, and identification of areas of potential concern. ACEH also requests a site plan figure depicting the foundation trench excavation plan overlain on to former use areas, and site soil bores, wells, and etc. ACEH also requests a cross-sectional figure depicting proposed building excavation areas (foundation trench, elevator, or other excavation) overlain on former use areas, and soil or well bore analytical data (especially soil data). Finally, the generation of a conceptual Proposed Soil Excavation Areas figure will also be of assistance in this process.
2. **Lead Contamination** – The referenced report utilized a HUD cleanup goal of 400 milligrams per kilogram (mg/kg) for lead. Please be aware that the Regional Water Quality Control Board (RWQCB) Environmental

Screening Level (ESL) for lead is currently 80 mg/kg for residential properties unless an alternative evaluation of risk has been conducted.

- 3. Semi-Annual Groundwater Monitoring Interval** – Please convert the well monitoring and sampling interval to a semi-annual interval. In order to capture potential worst-case contaminant concentrations, please use the second and fourth quarters to monitor groundwater concentrations beneath the site. Please submit groundwater monitoring by the dates identified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **February 21, 2014** – Notification of Available Meeting Dates and Times
- **August 1, 2014** – Groundwater Monitoring Report
File to be named: RO2945_GWM_R_yyyy-mm-dd
- **January 31, 2015** – Groundwater Monitoring Report
File to be named: RO2945_GWM_R_yyyy-mm-dd

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Should you have any questions, please contact me at (510) 567- 6876 or send me an electronic mail message at mark.detterman@acgov.org.

Cc Sami Malaeb, 350 Main Street, Suite H1, Pleasanton, CA 94566; (sent via electronic mail to s.malaeb@comcast.net)

Ms. Maria Campos, 1424 Fruitvale Avenue, Oakland, CA 94601

Mr. and Mrs. John Madler, 1030 Sutton Avenue, San Leandro, CA 94577

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Suite 3341, Oakland, CA 94612; (Sent via E-mail to: lgriffin@oaklandnet.com)

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PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>